

1 Michael J. Plati  
2 admitted pro hac vice  
CONSUMER ATTORNEYS  
3 8245 N. 85<sup>th</sup> Way  
Scottsdale, AZ 85258  
4 T: (602) 807-1505  
F: (718) 715-1750  
5 E: [mplati@consumerattorneys.com](mailto:mplati@consumerattorneys.com)

6 Michael Yancey III  
7 Nevada Bar Number 16158  
CONSUMER ATTORNEYS  
8 2300 West Sahara Avenue, Suite 800  
Las Vegas, NV 89102  
9 T: 480-573-9272  
E: [myancey@consumerattorneys.com](mailto:myancey@consumerattorneys.com)  
10 *Attorneys for Plaintiff*  
*Rafael Figueira*

11  
12 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

13 Rafael Figueira,

14 Plaintiff,

15 v.

16  
17 Experian Information Solutions, Inc.; Equifax  
Information Services, LLC; And Trans Union  
LLC,

18 Defendants.

19  
20  
21 **Case No.: 2:23-cv-00332-GMN-VCF**

**STIPULATION AND [PROPOSED]  
ORDER OF DISMISSAL WITH  
PREJUDICE**

22 Pursuant to Federal Rule of Civil Procedure 41, Plaintiff Rafael Figueira (“Plaintiff”) and  
23 Defendant Experian Information Solutions, Inc. (“Experian”), by and through undersigned  
24 counsel, hereby stipulate that this action and all claims and defenses asserted therein be dismissed  
25 with prejudice as to Experian. Plaintiff and Experian shall bear their own attorneys’ fees and costs  
26 incurred in the action against Experian.

1 There are no remaining Defendants in this matter.  
2

3 RESPECTFULLY SUBMITTED this 3rd day of August 2023.

4 By: /s/ Michael J. Plati  
5 Michael J. Plati  
6 admitted pro hac vice  
7 CONSUMER ATTORNEYS  
8 8245 N. 85<sup>th</sup> Way  
9 Scottsdale, AZ 85258  
T: (602) 807-1505  
F: (718) 715-1750  
E: [mplati@consumerattorneys.com](mailto:mplati@consumerattorneys.com)

10 Michael Yancey III, NV #16158  
11 CONSUMER ATTORNEYS  
12 2300 West Sahara Ave. Suite 800  
13 Las Vegas, NV 89102  
14 E: [myancey@consumerattorneys.com](mailto:myancey@consumerattorneys.com)  
T: (480) 573-9272  
F: (718) 715-1750

15 Consumer Attorneys  
16 8245 N. 85th Way  
Scottsdale, AZ 85258

17 *Attorneys for Plaintiff*  
18 *Rafael Figueira*

19 /s/ Benjamin Gordon  
20 Jennifer L. Braster  
21 Nevada Bar No. 9982  
22 Benjamin Gordon  
23 Nevada Bar No. 15552  
24 NAYLOR & BRASTER  
25 1050 Indigo Drive, Suite 200  
26 Las Vegas, NV 89145  
27 (T) (702) 420-7000  
28 (F) (702) 420-7001  
[jbraster@nblawnv.com](mailto:jbraster@nblawnv.com)  
[bgordon@nblawnv.com](mailto:bgordon@nblawnv.com)

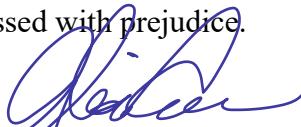
29 Cheryl O. Connor  
30 Nevada Bar No. 14745  
31 JONES DAY  
32 3161 Michelson Drive, Suite 800  
33 Irvine, CA 92612  
34 (T) (949) 851-3939  
35 (F) (949) 420-7001

36 *Attorneys for Defendant Experian*  
37 Information Solutions, Inc.

38  
39  
40 **IT IS ORDERED** that the Stipulation is **GRANTED**.

41  
42 The above-entitled matter is hereby dismissed with prejudice.

43 Dated: August 3, 2023

44   
45 \_\_\_\_\_  
46 Judge Gloria M. Navarro  
47 United States District Judge